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May 8, 2009

Mr. Jim Brown
Alaska Copper Works
P.O. Box 3546
Seattle, Washington 98124-3546
3223 Sixth Avenue South 98134-2105

RE: Stormwater Reporting Services Update

Dear Mr. Brown

Clean Harbors Environmental Services provides Alaskan Copper with environmental compliance reporting, regulatory environmental and safety assistance, and waste management program improvements such as waste reduction and program improvements. Please be advised that in the course of reporting your stormwater discharge sampling activities for 4QT, 2008 and 1QT, 2009 we have assessed a problem in the following areas. (See attachment)

1. Exceeding benchmark values for turbidity
2. Exceeding benchmark values for total zinc
3. Exceeding benchmark values for total copper

6-12-09
Lower / Smith
Western

The results for 4QT, 2008 would have necessitated a Level 2 response from Alaskan Copper requiring submitting to the Washington Department of Ecology (DOE) the results of the SWPPP corrective action (Please refer to **Level Two Response** explanation below). Clean Harbors provided notice to Alaskan Copper at that time but is unaware of any subsequent action taken.

The results for 1QT, 2009 necessitates a **Level One Response** requiring SWPPP corrective action but no submittal or corrective action results to DOE. (Please refer to **Level One Response** explanation below)

It is our recommendation that Alaskan Copper consider the following measures.

1. Conduct corrective action to identify, evaluate and implement additional source control methods to address the benchmark exceedance.
2. Update the current Alaskan Copper SWPPP.
3. Withhold submittal of the 1QT DMR until May 14th, 2009 to allow time for Alaskan Copper to evaluate and implement level one response actions.
4. Perform Stormwater management training for selected Alaskan Copper employees.

Clean Harbors can provide assistance in each of the three recommended courses of action. At this time Clean Harbors is prepared to submit the DMR for 1QT 2009 due May 15, 2009. We will withhold submitted until May 14th, 2009 pending your determination.

Please feel free to contact me should you have any questions regarding any of the services indicated above.

Sincerely,

Shawn A. Estrada

Field Service Specialist
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Discharge #	Location	QT	Year	Date Col	DMR Sub	BM	Turb	pH 6 to	Zinc	O&G	Cu	Lead	Hd	Action Level
							25	9	117	15	63.6	81.6	N/A	
CB331707	3317	1	2009	3/19/2009	5/8/2009	Fail	45.3	6.66	1390	6.54	418	27.9	76.2	1
CB331707	3317	4	2008	12/9/2008	2/14/2009	Fail	42.5	7.39	845	30	241	2.88	103	2

Level One Response – Each time a sample exceeds a benchmark, a facility inspection is conducted to identify and evaluate possible sources responsible for the benchmark exceedance. The SWPPP is updated to identify and evaluate additional source control methods to address the benchmark exceedance. Operational source control BMPs are documented in Worksheet #9. Enhanced/additional BMPs are documented in Worksheet #11.

Level Two Response – Whenever four samples exceed a benchmark, in addition to the Level One Response, a Source Control Study is conducted to identify and evaluate possible structural source control and treatment BMPs to address the benchmark exceedance. The Source Control Study at a minimum considers removal of contamination source, treatment of stormwater, and diversion of stormwater to the municipal sewage treatment plant. The Source Control Study is submitted to Ecology.